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September 19, 2018

REF: EPA Docket ID: EPA-HQ-OECA-2013-0311

Patrick Yellin

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Office of Management and Budget (OMB)

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via email at oir_submission@omb.eop.gov

Dear Sir or Madam,

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the information collection request (ICR), *Emission Guidelines for Sewage Sludge Incinerators* (EPA ICR No. 2403.04, OMB Control No. 2060-0661) noticed in the August 21, 2018 *Federal Register* (83 *Fed. Reg.* 42291). NACWA's members who own and operate sewage sludge incinerators (SSIs) are uniquely impacted by the emission guidelines and have an interest in the proposed extension of the ICR and the burden estimates.

NACWA supports the proposed increase in labor burden and costs based on the assumption that all respondents will have to familiarize themselves with the regulatory requirements each year. This rule is extremely complex and clean water utilities continue to struggle with the complicated web of monitoring and notification requirements. NACWA also supports the increase to reflect the inclusion of recordkeeping burden for operating parameters – an area where our members report a high burden level.

NACWA does not support the proposed decrease in the total capital and operation and maintenance costs and number of responses as compared to the previous ICR. EPA assumes that the decrease is warranted because: 1. the total number of SSI units has decreased since the previous ICR; and 2. that all facilities will meet the requirements for testing every three years rather than annual testing. While it is true that the total number of SSI units has decreased – utilities were forced to close several units where they could not afford to upgrade – the assumption that all facilities will meet the requirements for testing every three years is incorrect.

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NACWA reached out to its SSI members to seek input on this assumption. We heard back from 8 utilities, only 2 of which are currently allowed to test every three years for all parameters. The other utilities had not met the requirements to move away from annual testing for one or more emission limits. We do not have information on the other utilities who did not provide feedback, but clearly EPA's assumption that all SSIs have moved to testing every three years is incorrect.

Please contact me at chornback@nacwa.org should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hornback". The signature is fluid and cursive, with the first name "Chris" being more prominent.

Chris Hornback
Deputy Chief Executive Officer